

Issue Report

Issue 66 'Responsibility for addressing Meter faults for Dual Function Meters with different Suppliers for Import and Export'.

ELEXON



Contact

Lawrence Jones

020 7380 4118

royston.black@elexon.co.uk



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About This Document

This document is the Issue 66 Group's Report to the BSC Panel. ELEXON will table this report at the Panel's meeting on 13 April 2017.

This document provides details of the Issue Group's discussions and proposed solutions to the highlighted issue and contains details of the Workgroup's membership.

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Issue 66

Ecotricity raised [Issue 66 'Responsibility for addressing Meter faults for Dual Function Meters with different Suppliers for Import and Export'](#) on 19 January 2017 after advice from ELEXON on the clarity of a solution they wished to progress to assessment.

In domestic scenarios (profile Classes 1-4) with modern Smart Metering Equipment Technical Specification (SMETS) compliant metering systems, Import and Export of Electricity can be managed by the same meter. Different Suppliers can be responsible for the Imported energy and the Exported energy. The Import Supplier is responsible for;

1. Supply of energy to the customer
2. Asset rental payments for the Meter
3. Maintenance and repair of the Meter
4. Appointment of the Meter Operator Agent (MOA)

The Export Supplier is responsible for;

1. Purchase of surplus energy from the customer

Ecotricity cited several examples where they have struggled to correctly identify the appointed MOA. Where the MOA is identified, Export Suppliers can struggle to succeed in requesting repair or maintenance works to be undertaken on faulty meters where another party is the Import Supplier. These issues apply to customers in Profile Classes 1-4 with dual Import/Export Meters the majority of which are Smart SMETS Meters. Where there is small scale generation for Feed In Tariff (FITs) customers there is normally an Export Meter fitted by the customer to measure Generation and any exported spill for the Export Supplier.

The key issues described were:

- Identification of the import MOA. Currently done manually through Electricity Central Online Enquiry Service (ECOES).
- Communication with the appointed MOA or Import Supplier. Currently done via fax or e-mail.
- Having only a deemed contract with the appointed MOA or contractual terms, which prevent agreement to service level agreements (SLAs) or acceptance of work requests.

Workgroup members noted similar issues in Profile Classes 5-8. In particular they noted that it is problematic identifying the correctly appointed MOA where the customer directly appoints the Meter Operator. Members also noted that Proposed Modification P332 is looking at this issue.

Where dual Import/Export Meters are fitted there is a requirement for separate MSIDs for the Import and Export. Furthermore, one MSID might be Half-Hourly (HH) and one might be Non-Half-Hourly (NHH)¹. There are therefore many combinations of potential metering arrangements. Additionally, Imports and Exports may be by separate Meters for Import

¹ The Balancing and Settlement Code (BSC) requires that all Exports (which are to be settled) above the Small Scale Third Party Generating Plant Limit (SSTPGPL) shall be HH Metering Systems. Metering Systems under these limits may be either HH or Non Half Hourly (NHH) Metering Systems.

and Export. In either case, the Import and Export will be regarded as separate Metering Systems for BSC purposes. Where there is small scale generation the FiTs customer may also have a non-BSC Meter that records the generation for FiTs generation payments.

Questions considered under Issue 66	
1	How does dual function metering currently work?
2	How do you recognise a Site with Generation present?
3	Who is responsible for appointments and maintenance?
4	How do parties interact and communicate?
5	What are the Key Issues?
6	Can the Issues be resolved by the BSC?
7	Does CP1483 have any interaction with this Issue?
8	What is the recommendation to take forward?

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How does dual function metering currently work?

The Workgroup discussion started with a clarification from ELEXON that although BSC [Section J paragraph 4.1.4](#) specifically related to Shared Supplier Volume Allocation (SVA) Meter systems which relate to HH Metering Systems. This Issue group is intending to look at HH SVA Systems and NHH dual function (import and export) metering systems.

Several scenarios were established in the Workgroup and formed part of the discussions:

1. One meter with one Meter Point Administration Number (MPAN) for both, Import NHH or HH and Export NHH but not Settled.
2. One meter, two MPANs one for Import and one for Export, Import HH or NHH and Export HH.
3. Separate meters for Import and Export each with its own MPAN, Import HH or NHH, Export NHH.
4. Separate meters for Import and Export each with its own MPAN, Import HH, Export HH.

The above scenarios are not an exhaustive list and can apply across Profile and Measurement Classes. More information can be found in the BSC guidance on [Metering demand sites with generating equipment installed](#).

How do you recognise a site with generation present?

Members agreed that currently it is not easy to identify sites that have generation installed and may have related MSIDs. It had been suggested that ECOES could be used to identify this. However, some Suppliers will remove a digit from the start of the Meter Serial Number on installed Export meters due to restrictions in existing systems that prevent duplication of MSIDs within the Suppliers database. This creates a data conflict in ECOES and breaks the link that would show more than one MPAN at the site. Even without this defect, the indication of additional MPANs is not a reliable indicator of generation being present as it is dependent on being populated correctly.

Another downside to the use of ECOES is that it is a manual process. It is not possible to interrogate the system via automation without uploading the quarterly database file provided by Supplier Meter Registration Systems (SMRS) to core systems.

You may be able to determine a related MSID via the Meter Timeswitch Codes (MTC) present in many industry Data Transfer Company (DTC) Flows. In some cases an MTC of 500 to 700 will indicate a secondary MPAN present. The term Related MPAN is a defined term in the Master Registration Agreement (MRA). Two MPANs at one site, one for Import and one for Export are not related MPANs within the MRA definition. Use of MTCs is unreliable due to the number of available codes and combinations which do not clearly indicate Generation.

Line Loss Factor Class (LLFCs) identifiers can be used to identify where Generation (Export) is present but will only be available on the MSID that is being used for the Export. This is not useful if you only have access to the related Import MSID and are not aware it has an associated MSID with Export.

Members also noted that where Distributors identify Generation has been installed they should notify Import Suppliers using the [D0001](#) and Data Transfer Catalogue Data Item [J0024 Site Visit Check Code](#) (SVCC) '42 –site capable of exporting energy'. Distributors should issue this flow once generation plant compliant with Energy Networks Association (ENA) procedures [G83](#) or [G59](#) has been installed at a Site.

Overall the workgroup were unable to define one comprehensive and reliable way to identify Sites with installed Generation.

Who is responsible for appointments and maintenance?

The Issue Workgroup agreed that in scenarios where a single dual Meter is used for Import and Export the Import Supplier is defined as the Import Supplier and is responsible for appointment of the MOA for a Metering System. In the scenario for Meters where the Export is being Settled HH or NHH and is above 30 kWh the Export supplier is required under [Section J of the BSC](#) to appoint the same MOA as the Import Supplier in regards to the metering system.

The same principle applies where Import is less than 100 kW and the Export is less than 30 kW. In all scenarios where there is a single meter for Import and Export the Import Suppliers primacy is re-enforced by their sole responsibility for rental payment to any Meter Asset Provider (MAP) who owns the Meter system.

In sites where less than 100 kW import Current Transformer (CT) Meters are installed and the customer has installed greater than 30 kW Generation and separate Export CT Meter the customer may appoint their own MOA provided no parts of the Metering systems are shared. Normally CTs are defined as part of a Shared Metering system so Suppliers would need to appoint the same MOA.

This last scenario was highlighted by the Workgroup as being a source of issues in MOA appointment and communication between customer, Import and Export Suppliers.

The Proposer highlighted that where they identify the MOA appointed by the Import Supplier and make the same appointment it is often on a deemed contract and it can be difficult or not commercially viable to negotiate a bespoke deal for Export only.

How do parties interact and communicate for appointments and work requests?

Workgroup members advised that [D0001](#) flows are used to request the MOA to investigate issues. They can also be used by Licenced Distribution System Operators (LDSOs) to request Data Collectors (DC's) and Import Suppliers to take action. DC's may use them to request Import Suppliers or MOA's to investigate issues. However in many cases Export Suppliers have to resort to using Fax and E-mail to communicate with Import Suppliers and appointed MOA's as there are no specific Industry Flows or systems that provide this capability.

What are the key issues?

Through the discussions the issue Workgroup determined that the primary issue that needs to be addressed is accurate identification of generation capability at sites. If there

was a reliable method of identifying sites with generation and Export capability it would be easier to manage processes that seek to identify if there is an Export Supplier.

This marker would also create an additional link between Import and Export MPANs that would enable both Suppliers to rapidly identify each other and the appointed MOA.

The Workgroup also recognised that Export Suppliers having deemed contracts with MOA's appointed by the Import Supplier or customer was not ideal but that it should not be a blocker to remedial work being instructed or undertaken. Meter Operators are bound under the Performance Assurance Framework (PAF) to act if they are instructed by any party (with whom they have a contract) that the Meter may be faulty. Further the Workgroup recognises this is a commercial matter and outside the remit of code administrators to resolve.

Can the issues be resolved by the BSC?

The Workgroup discussed a number of potential ways to communicate the existence of generation at a site more effectively. The majority of the solutions revolved around amendments to DTC flows to update SMRS and/or Suppliers. Changes to flows such as the [D0268](#), [D0150](#) and [D0217](#) were mentioned but it was noted that changes to these would potentially have a high cost of implementation and would be unlikely to be supported by other industry parties without significant benefits. No solution was identified which would involve change to either the BSC or any Code Subsidiary Documents (CSDs).

Does CP1483 have any interaction with this Issue?

The Workgroup determined that [CP1483](#) is unrelated to this Issue as it is only focussed on Shared SVA HH Metering systems and relates to an information timing issue rather than faulty Meters.

What is the recommendation to take forward?

The Workgroup recommended that the Proposer submit a MRA Issue Form (MIF) to the MRA Issue Resolution Expert Group (IREG) to ask them to consider changes to flows or ECOES to improve identification of sites where Generation is present and communication between relevant parties for appointment or de-appointment of MOAs. Members considered that this would be the most appropriate way to enable the necessary change and offered support to the Proposer in shaping the MIF to get best chance of Industry support.

3 Conclusions

Conclusions

The Issue 66 Group considered the questions set out in Section 1 at its meeting on 14 February 2017.

The Issue 66 Group did not formally recommend that a Modification or Change Proposal be raised. The Issue 66 Group did suggest that the Proposer raise a MIF to IREG to ask them to consider changes to flows or ECOES to improve identification of sites where

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Generation is present and communication between relevant parties for appointment or de-appointment of MOAs.

The Issue 66 Report will be tabled at the 13 April 2017 Panel meeting.

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Appendix 1: Issue Group Membership

Issue Group membership and attendance

Issue 62 Group Attendance		
Name	Organisation	14 Feb 17
Lawrence Jones	ELEXON (<i>Chair</i>)	✓
Royston Black	ELEXON (<i>Lead Analyst</i>)	✓
Sarah Eager	ELEXON (Design Authority)	✓
Kevin Spencer	ELEXON (Design Authority)	✓
Laura Henshall	ELEXON (Operational Support Manager)	✓
Joshua Phelps	Ecotricity (Proposer)	✓
Colin Prestwich	Smartest Energy	✓
Shaun Heasman	Opus Energy	✓
Lee Stone	E.ON Energy	✓
Jonathan Moore	ENGIE	✓
Joseph Henry	E.ON Energy	✓
Gregory MacKenzie	British Gas	×
Tom Chevalier	Association of Meter Operators	×

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Appendix 2: Glossary & References

Acronyms

Acronyms used in this document are listed in the table below.

Acronyms	
Acronym	Definition
CSD's	Code Subsidiary Documents
CT	Current Transformer
DC	Data Collector
DCC	Data Communication Company
DTC	Data Transfer Catalogue
ECOES	Electricity Central Online Enquiry Service
ENA	Energy Networks Association
FITs	Feed In Tariff
HH	Half Hourly
IREG	Issue Resolution Expert Group
kW	Kilowatt
LLFs	Line Loss Factors
MAP	Meter Asset Provider
MIF	MRA Issue Form
MOA	Meter Operator Agent
MSID	Metering System Identifier
MRA	Master Registration Agreement
MTCs	Meter Timeswitch Codes
NHH	Non Half Hourly
SLA	Service Level Agreement
SSTPGL	Small Scale Third Party Generating Plant Limit2
SVA	Supplier Volume Allocation
SVCC	Site Visit Check Codes

External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

External Links		
Page(s)	Description	URL
2	Link to Issue 66 page on ELEXON Website	https://www.elexon.co.uk/smg-issue/issue-66/

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Page(s)	Description	URL
2	Link to BSC Annex X-1 page on ELEXON Website	https://www.elexon.co.uk/wp-content/uploads/2017/02/Section_X_1_v76.0.pdf
3	Link to Section J page on ELEXON Website	https://www.elexon.co.uk/wp-content/uploads/2014/11/Section_J_v13.0.pdf
3	Link to ELEXON Guidance on Import and Export Metering	https://www.elexon.co.uk/wp-content/uploads/2015/07/import_export_guidance_v6.0.pdf
3, 4	Link to DTC information on D0001 Flow	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0001&FlowVers=1&searchMockFlows=False
3	Link to DTC information on J0024 Data Item	https://dtc.mrasco.com/DataItem.aspx?ItemCounter=0024&searchMockItems=False
3	Link to ENA information on G83 procedure	http://www.energynetworks.org/electricity/engineering/distributed-generation/engineering-recommendation-g83.html
3	Link to ENA information on G59 procedure	http://www.energynetworks.org/electricity/engineering/distributed-generation/engineering-recommendation-g59.html
5	Link to DTC information on D0268 Flow	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0268&FlowVers=1&searchMockFlows=False
5	Link to DTC information on D0150 Flow	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0150&FlowVers=1&searchMockFlows=False
5	Link to DTC information on D0217 Flow	https://dtc.mrasco.com/DataFlow.aspx?FlowCounter=0217&FlowVers=1&searchMockFlows=False
5	CP1483	https://www.elexon.co.uk/change-proposal/cp1483/